



Western States Petroleum Association
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Catherine H. Reheis-Boyd

Chief Operating Officer and Chief of Staff

March 23, 2007

California Energy Commission
Docket Office
Attn: Docket 06-AFP-1
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
Via email docket@energy.state.ca.us

Re. Docket No. 06-AFP-1 "Alternative Fuels Plan Full Fuel Cycle Analysis Workshop"

The Western States Petroleum Association (WSPA) represents companies that explore for, produce, transport, refine and market petroleum and petroleum products in California and five other western states. We appreciate the opportunity to submit comments to CEC and CARB on TIAX's Full Fuel Cycle Analysis. We also appreciate the extension of the deadline for comments.

As indicated at the March 2 workshop, WSPA still believes the very limited public review time constrained our ability to thoroughly critique TIAX's work. Therefore, we limited our review to certain fuels and certain portions of the full fuel cycle.

Given the limited scope of our review, our contractor, ERM, believes that the following areas require further work before the TIAX model can be used for regulatory purposes:

- Comparison of greenhouse gas emissions
- Consequential impacts
- Conformance to standards
- Refinery efficiency
- Sensitivity/uncertainty analysis
- Land use assumptions
- List of premises/assumptions requiring additional analysis

WSPA would like to request a meeting as soon as possible to go over these areas with your contractor. Please contact me at this office or Gina Grey at (480-595-7121) with possible dates. We would like to ensure we have further dialogue on this important analysis and better understand if and why there may be a difference of opinion in some of these areas.

Sincerely,

A handwritten signature in black ink, which appears to read "Catherine H. Reheis-Boyd". The signature is fluid and cursive, with the first name being the most prominent.